



Emanuel Kataev, Esq. | Attorney
D: (917) 807-7819
E: ekataev@consumerattorneys.com

July 25, 2025

VIA ECF

Hon. Annemarie Carney Axon
United States District Court
Northern District of Alabama
1729 5th Avenue North
Birmingham, AL 35203

Re: Curry, Ja'Miya v. Glenwood, Inc.
Case No. 2:25-cv-00263

Dear Judge Annemarie Carney Axon,

This firm, represents Plaintiff Ja'Miya Curry (hereinafter the "Plaintiff") in the above-referenced action. We write with the consent of Defendant to respectfully request a thirty (30) day extension of time to respond to its Motion to Dismiss.

Plaintiff filed her Amended Complaint on April 17, 2025. See Dkt. 8. Defendant filed a partial motion to dismiss on July 7, 2025, and Plaintiff's response is due on July 25, 2025. See Dkt. # (motion) and # (Order). Due to deadlines and appearances in other matters, including two (2) full days of evidentiary hearing on July 9 and 16 this month before the Hon. Lewis J. Liman, U.S.D.J. of the United States District Court for the Southern District of New York in an unrelated case, we request a thirty-day extension of time to respond to Defendant's partial motion to dismiss, which would extend our time to respond to August 25, 2025.

This is our first request for an extension of time to respond. We require additional time to ensure that we can review Defendant's Partial Motion to Dismiss Complaint and respond appropriately.

We thank the Court for its attention and consideration in this matter

Dated: Jamaica, New York
July 25, 2025

Respectfully submitted,

CONSUMER ATTORNEYS, PLLC

/s/ David I. Schoen

David I. Schoen
Bar No. 0860-042D
2800 Zelda Road
Suite 100-6y
Montgomery, AL 36106
T: (334) 395-6611
david@schoenlawfirm.com
schoenlawfirm@gmail.com

/s/ Emanuel Kataev

Emanuel Kataev, Esq.
6829 Main Street
Flushing, NY 11367-1305
(718) 412-2421 (office)
(718) 489-4155 (facsimile)
ekataev@consumerattorneys.com

Attorneys for Plaintiff
Ja'Miya J. Curry